

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

JOE ALEXANDER

Plaintiff,

v.

Case No. 3:19-cv-00688-JAG

DIET MADISON AVENUE, *et al.*,

Defendants.

**JOINT STIPULATION OF PLAINTIFF AND PROPOSED INTERVENORS  
CONCERNING MOTION FOR LEAVE TO INTERVENE, TO SEAL CONFIDENTIAL  
INFORMATION AND FOR PROTECTIVE ORDER**

Plaintiff, by counsel, and Proposed Intervenor The Interpublic Group of Companies, Inc. (“IPG”) and The Martin Agency, Inc. (“Martin”) (collectively, “Proposed Intervenor”), by counsel, submit this joint stipulation concerning Proposed Intervenor’s *Motion For Leave To Intervene, To Seal Confidential Information and For Protective Order* [Dk. No. 5] (“Motion To Seal”). Plaintiff and Proposed Intervenor are referred to collectively herein as the “Parties.”

The parties agree to the entry of an order that:

1. Grants Proposed Intervenor’s motion for leave to intervene;
2. Orders the Clerk remove the Complaint [Dk. No. 1] from the public docket and maintain it under seal until further order of the Court;
3. Orders the Clerk to file the redacted Complaint attached hereto as Exhibit A and make the redacted Complaint available for public inspection; and
4. Orders that information identifying Plaintiff’s accusers, unless the accuser has already identified herself publicly, either directly or through her attorney, be deemed confidential and not filed publicly absent further order of the Court, consistent with the Memorandum Order

entered in the civil action *Perrott v. The Interpublic Group of Companies, Inc., et al.*, Case No. 3:18-cv-737-REP (E.D. Va. Apr. 3, 2019), a copy of which is attached to the memorandum in support of the Motion To Seal [Dk. No. 9-6].

Plaintiff's counsel's signature to this joint stipulation is made by undersigned counsel for Proposed Intervenor with Plaintiff's counsel's consent.

Date: November 8, 2019.

Respectfully submitted,

/s/ David B. Lacy

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